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**Attorneys for Defendant**

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF OREGON**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**PIROUZ SEDAGHATY,**

**Defendant.**

**CR 05-60008 HO**

**MOTION FOR A BILL OF  
PARTICULARS**

Defendant, Pirouz Sedaghaty, by and through his attorneys, Lawrence Matasar and Federal Public Defender Steven T. Wax, hereby moves this Court for an order for a Bill of Particulars.

Count One of the Amended Indictment (CR 22) alleges that Mr. Sedaghaty and co-defendant Soliman Al-Buthe did “unlawfully, willfully, and knowingly conspire, combine, confederate, and agree together and with each other and with *other individuals and organizations both known and unknown to the grand jury* to defraud the United States (emphasis added).

Mr. Sedaghaty respectfully requests specification through a Bill of Particulars of the names of the unnamed individuals and organizations known to the grand jury and those unnamed individuals and organizations unknown to the grand jury but known to the government.

RESPECTFULLY SUBMITTED this 4<sup>th</sup> day of August, 2009.

/s/ Steven T. Wax

Steven T. Wax  
Federal Public Defender

/s/ Lawrence H. Matasar

Lawrence H. Matasar